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February 26, 2020

VIA ECF

MEMORANDUM ENDORSED

Honorable Gregory H. Woods, U.S.D.J.
United States District Court , Southern District of New York
500 Pearl Street, Room 2260
New York, New York 10007

Re: Khmaladze et al. v. Vorotyntsev et al., 16-cv-8029 (GHW)
(the "Khmaladze action")

Tatintsian et al. v. Vorotyntsev et al., 16-cv-7203 (GHW)
(the "Tatinsian action")

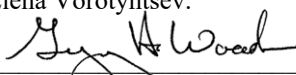
Dear Judge Woods:

The undersigned has appeared as counsel today by filing of a notice on behalf of defendants/counterclaimants AUM CODE LLC, IT ADAPTER LLC, and SHOPLINK, INC. in the Khmaladze action and defendant/cross-claimaint/counterclaimant SHOPLINK, INC. in the Tatsinsian action. It is respectfully our intention to move as soon as is practicable pursuant to Fed. R. Civ. P. 55 for relief vacating the Court's recent order holding these entities in default for failure to timely obtain counsel, and to oppose the plaintiffs' pending application to enter a default judgment.

I am in receipt of the letter to the Court yesterday from Partha P. Chattoraj, Esq., requesting that the pending motion for a default judgment be adjourned due to a conflict on his part as well as that of Ms. Santillo. We join in that request and would additionally ask that the court set a briefing schedule, including an adjournment of the date to submit opposition thereto, by which the motion could be heard along with our not-yet-filed order to show cause to vacate the default. That motion could be filed as early as next Monday, March 2.

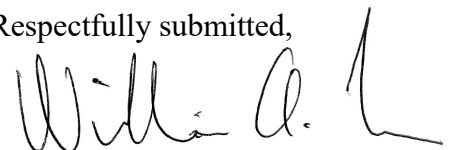
Of the various adjourned dates proposed by counsel, I would be available on all except for March 6, except that I have conflicts in the mornings of March 20, 24 and 25 but would be available in the afternoon on those three dates.

Application granted. If Aum Code LLC, IT Adapter LLC, and ShopLink Inc. (the "Corporate Defendants") intend to propose an order to show cause to vacate the default judgment, they are directed to do so by March 5, 2020. If the Corporate Defendants intend to file a response to the February 19, 2020 order to show cause, Case No. 16-cv-7203, Dkt. No. 235; Case No. 16-cv-8029, Dkt. No. 116, they are directed to do so by March 10, 2020. Any reply to such response must be filed by March 16, 2020. The March 9, 2020 hearing is adjourned to March 25, 2020 at 1:30 p.m. The parties may wish to confer prior to March 5, 2020 regarding the need for extended motion practice with respect to the Corporate Defendants' default. The Clerk of Court is directed to terminate the motions pending at Case No. 16-cv-8029, Dkt. Nos. 118 and 121 and Case No. 16-cv-7203, Dkt. No. 238. The Clerk of Court is directed to mail a copy of this order to Mikhail Vorotyntsev and Elena Vorotyntsev.
SO ORDERED.



GREGORY H. WOODS
United States District Judge

Respectfully submitted,



William A. Thomas (0116)

Dated: February 28, 2020
New York, New York